

THE CITY OF NEW YORK LAW DEPARTMENT

100 CHURCH STREET NEW YORK, NY 10007 GEOFFREY M. STANNARD

Assistant Corporation Counsel
Phone: (212) 356-2409
Fax: (212) 356-1148
Email: gstannar@law.nyc.gov

BY ECF

JAMES E. JOHNSON

Corporation Counsel

Honorable Vernon S. Broderick United States District Judge United States District Court Southern District of New York 40 Foley Square New York, New York 10007 APPLICATION GRANTED SO ORDERED A VERNON S. BRODERICK U.S.D.J. 12/3/2019

Re: <u>Tiffany Guerrero v. Detective David Revans</u>, 14-CV-8035 (VSB)

Your Honor:

I am an Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, and the attorney for defendant Detective David Revans in the above-referenced case. I write respectfully on behalf of all parties to request an extension of time, to December 20, 2019, for the parties to file their joint proposed jury instructions, voir dire questions, and verdict sheet. This is the parties' first such request.

Trial in this matter is scheduled to begin on February 24, 2020. (See ECF No. 73.) By Order dated September 25, 2019, the Court endorsed the parties' proposed schedule for the filing of pre-trial documents. Pursuant to that Order, the parties' joint proposed jury instructions are due on December 2, 2019, and the parties' joint proposed voir dire questions and verdict sheet are due on December 9, 2019.

Due to scheduling conflicts created by the holiday season, the parties have not yet finalized their proposed jury instructions. In addition, plaintiff's counsel Regina Darby has a trial beginning on December 9, 2019, in the Eastern District of New York before the Honorable Frederic Block, in the matter of Emelda Fitzroy v. City of New York, et al., 16-CV-477 (FB)(ST). Plaintiff's counsel anticipates that the trial may last up to seven days.

Accordingly, to allow the parties time to exchange and finalize their remaining joint pretrial submissions, the parties request an extension of time, to December 20, 2019, to file their joint proposed jury instructions, voir dire questions, and verdict sheet.

The parties thank the Court for its time and consideration in this matter.

Respectfully submitted,

/s/

Geoffrey M. Stannard
Assistant Corporation Counsel

cc: **BY ECF**

Regina Darby, Esq., Attorney for Plaintiff